

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, *et al.*,
individually and on behalf of a class of all others
similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

No. 1:18-cv-00719-CCR

**STATUS UPDATE REGARDING PLAINTIFFS' FOURTH REQUEST FOR
PRODUCTION OF DOCUMENTS**

As ordered by the Court at the December 14, 2020 hearing, Plaintiffs' respectfully submit this status report with respect to Plaintiffs' Fourth Request for Production of Documents and RFP 76. The parties have met and conferred twice and have made substantial progress in reaching an agreement as to most of the requests. The parties have not yet agreed on a date by which Defendants will produce responsive documents. With respect to RFP 88, which seeks documents concerning the Erie Crime Analysis Center, the parties have not reached agreement but are engaged in ongoing discussions. Plaintiffs seek an additional two weeks to continue conferring with Defendants in order to narrow the issues to be presented to the Court.

Dated: February 12, 2021

Respectfully Submitted,

/s/ Keisha A. Williams

Joseph Keleman
Keisha Williams
WESTERN NEW YORK LAW CENTER
Cathedral Park Tower
37 Franklin Street, Suite 210
Buffalo, NY 14202
Tel: (716) 828-8415
Fax: (716) 270-4005
jkeleman@wnylc.com
kwilliams@wnylc.com

/s/ Darius Charney

Darius Charney
Chinyere Ezie
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th Floor
New York, NY 10012
212-614-6475
DCharney@ccrjustice.org
CEzie@ccrjustice.org

/s/ Claudia Wilner

Claudia Wilner
Edward Krugman
Britney Wilson
NATIONAL CENTER FOR LAW
AND ECONOMIC JUSTICE
275 Seventh Avenue, Suite 1506
New York, NY 10001
212-633-6967
wilner@nclej.org
krugman@nclej.org
wilson@nclej.org

/s/ Jordan S. Joachim

Jordan Joachim
COVINGTON & BURLING LLP
620 Eighth Avenue
New York, NY 10018
212-841-1000
jjoachim@cov.com

CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2021, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Western District's Local Rules, and/or the Western District's Case Filing Rules & Instructions upon all counsel registered through the ECF System.

/s/ Claudia Wilner